

## REMARKS

This Amendment is being filed in response to the Office Action dated November 20, 2001. Reconsideration and allowance of the application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-21 are pending in this application of which Claims 1, 11, 18, 19, 20, and 21 are independent claims.

In the Office Action, Claims 1-6, 9-15, and 18-21 are rejected under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,991,713 to Unger ("Unger"). Claim 7-8 and 16-17 are rejected under 35 U.S.C. §103(a) as unpatentable over Unger in view of U.S. Patent No. 6,175,820 to Dietz ("Dietz").

Unger teaches a system that takes a file having a first file format, such as HTML (e.g., see, Col. 4, lines 1-2), compresses textual data from the file (e.g., see, FIG. 7 and the accompanying text contained in Col. 8, lines 40-48), and results, after compilation, in second file having a second file format (see, FIG. 7, wherein the input files 28, 22, 24, 20, and 28 which are compiled by compiler 50 and result in compiled file 52). This method has a great disadvantage, wherein while it results generally in a reduced file size, it requires a separate proxy server 110 "for translating [the] compiled hypertext file into [an] uncompiled format, and for determining when the browser 82 includes a personal proxy 84 capable of reading a compiled file 52." (See, Col. 13, lines 10-17, and FIGs. 7, 11, and 13). "Regardless of whether the proxy is running in the

client computer 10 or somewhere else in the network, the proxy always adds some information to the request to enable the remote server 12 to determine that there is a proxy in-line somewhere that is capable of dealing with the compiled HTML format." In the event that none is available, "the remote server 12 must decompress and decompile the requested data within the stored, compiled file 52 prior to transmission to the requester." (See, Col. 13, line 66 through Col. 14, line 4 and Col. 14, lines 8-14.) In other words, because the system as taught by Unger takes a file in a first file format, compresses the text, and then translates the result to a second file format, an intermediate program is required to translate the document back to the first format before the file is readable. In fact, even the tags are altered in the file compressed file format of Unger and a correspondence table is created to preserve the relationship between the tags and corresponding text and objects (see, Col. 8, lines 40-44).

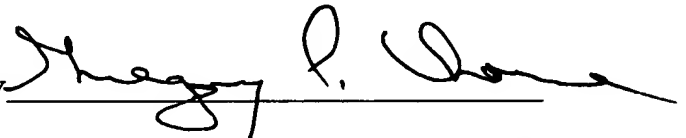
In sharp contrast thereto, Unger does not disclose or suggest (emphasis provided) "compressing only said data elements in said document using a compression algorithm, wherein said document before and after the compressing step is in a given file format" as required by Claim 1 and as substantially required by each of independent Claims 11, 18, 19, 20, and 21. The present invention has a tremendous advantage over the system of Unger in that a separate process is not required to ascertain the hierarchical structure of the data since the resultant document is in the same file format as the input document.

Based on the foregoing, the Applicant respectfully submits that independent Claims 1, 11, 18, 19, 20, and 21 are patentable over Unger, and notice to this effect is earnestly solicited. Claims 2-10 and 12-17 respectively depend from one of Claims 1 and 11 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained therein. Accordingly, separate consideration of each of Claims 2-10 and 12-17 is respectfully requested.

The Applicant has made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Early and favorable action is earnestly solicited.

Respectfully submitted,

By 

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February 20, 2003

CERTIFICATE OF MAILING

It is hereby certified that this correspondence is being deposited with the United States Postal Service as first-class mail in an envelope addressed to:

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on February 20, 2003

By Noemi Chpc  
Mailing Party